

EXHIBIT 67

MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

WILLKIE FARR & GALLAGHER LLP
BENEDICT Y. HUR (SBN: 224018)
bhur@willkie.com
SIMONA AGNOLUCCI (SBN: 246943)
sagnolucci@willkie.com
EDUARDO E. SANTACANA (SBN: 281668)
esantacana@willkie.com
LORI ARAKAKI (SBN: 315119)
larakaki@willkie.com
One Front Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 858-7400
Facsimile: (415) 858-7599

Attorneys for Defendant
GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIGUEZ AND JULIE ANNA
MUNIZ, individually and on behalf of all other
similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DEFENDANT GOOGLE LLC’S
FOURTH SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO
PLAINTIFFS’ INTERROGATORIES,
SET ONE**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor
Action Filed: July 14, 2020

PROPOUNDING PARTY: PLAINTIFFS ANIBAL RODRIGUEZ AND JULIEANNA MUNIZ

RESPONDING PARTY: DEFENDANT GOOGLE LLC

SET NO.: ONE

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

11. Data Deletion

Analytics Measurement data follow the Analytics standard retention policy. Some of the key default storage retention periods in GA for Firebase include:

- Collection logs: 8 weeks
- Event ingestion output: 4 days
- Raw baseview: 60 days
- Aggregates: Kept indefinitely

INTERROGATORY NO. 2:

Please identify every app that includes or has included Google’s Firebase SDK since the start of the Class Period, including for each app the time period during which that app used Google’s Firebase SDK and Google therefore would have received data even when users had Web & App Activity turned off (or previously paused).

RESPONSE TO INTERROGATORY NO. 2:

Google objects to Interrogatory No. 2 as vague and ambiguous as to the undefined term “Web & App Activity.” For purposes of this response, Google construes Web & App Activity to mean the account-level setting called Web & App Activity. Google further objects to this Interrogatory as vague and ambiguous with respect to the phrases “Google therefore would have received the data” and “Firebase SDK.” Google further objects that the definition of “Class Period” is vague and ambiguous, as the Interrogatories define the term to mean “the class period in this case, as defined in the operative complaint,” when the “operative complaint” has changed between when the Interrogatories were served and when these responses were provided, and the definition of “Class Period” differs between the original and amended complaints. Google further objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete range of time. Google further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine. Google further objects to this Interrogatory because it is unduly burdensome, overbroad, and disproportionate to the needs of the Action, as it seeks a list of every app that includes or has

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 included “Google Firebase SDK” since the start of the “Class Period,” which may have little to no
 2 bearing on Plaintiffs’ claims. Google objects that this request is incomprehensible and unduly
 3 burdensome to the extent it seeks information from the time periods during which an
 4 undifferentiated set of users had WAA turned off and were using an app that utilized Firebase
 5 SDK.

6 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

7 Subject to and without waiving the foregoing, Google responds as follows: Google has
 8 conducted a reasonably diligent search to determine which Android apps of the ones identified in
 9 Plaintiffs’ First Amended Complaint (FAC ¶¶ 207, 209, 211, 213, 215, 217, 219, 221, 223) have
 10 had Google Analytics for Firebase enabled. There are several complications to keep in mind with
 11 such data. First, app developers may give their users granular control over whether Google
 12 Analytics for Firebase is enabled on that app, and that could be turned on and off at any given
 13 moment by a user. Second, an app developer may show as having Google Analytics for Firebase
 14 turned on, but not actually be using it to transmit any data. Third, even if an app developer has
 15 used Google Analytics for Firebase in the past, that does not mean that it is currently using it.
 16 Finally, Google’s investigation is current as of this week.

17 Subject to the foregoing caveats, Google has been able to determine that the following
 18 Android apps have had Google Analytics for Firebase enabled:

- | | |
|-------------------------|----------------------------|
| 19 • ABC | • Angie’s List |
| 20 • Accuweather | • Apple Music |
| 21 • Acorns | • Applebee’s |
| 22 • Acrobat Reader | • Aqua Mail |
| 23 • Alarm Clock for Me | • Atmosphere |
| 24 • Alibaba | • Audio Recorder |
| 25 • Ali Express | • Auntie Anne’s |
| 26 • All Trails | • Avast Cleanup |
| 27 • Amazon Prime Video | • Avast Antivirus – Scan & |
| 28 • American Airlines | RemoveVirus |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|----------------------------|-----------------------------|
| 1 | • B. Good | • Cooking Fever |
| 2 | • Baseball Superstars 2020 | • Coursera |
| 3 | • Baskin Robbins | • Craigslist |
| 4 | • BBC America | • Cricket Partner Tab |
| 5 | • Best Buy | • Current |
| 6 | • Better Help | • Dad Jokes |
| 7 | • Bible | • Daily Mail Online |
| 8 | • Bixby Vision | • Dairy Queen |
| 9 | • BluHop | • Dillon’s |
| 10 | • Bodies by Rachel | • Discord |
| 11 | • Booking.com | • Dogo |
| 12 | • Bruster’s | • Dollar General |
| 13 | • California Lottery | • Domino’s |
| 14 | • Call of Duty | • DoorDash |
| 15 | • Calm | • Dosh |
| 16 | • Candy Crush | • Dropbox |
| 17 | • Candy Crush Saga | • Duo |
| 18 | • Canva | • Duolingo |
| 19 | • Cardiogram | • E*Trade |
| 20 | • CBS | • eBay |
| 21 | • CBS Sports | • Ecobee |
| 22 | • Chewy | • Einstein Bros Bagels |
| 23 | • Chick-fil-A | • EMAY Portable ECG Monitor |
| 24 | • Chili’s | • Emergency Alerts |
| 25 | • ClassDojo | • Epocrates |
| 26 | • Clawee | • ESPN |
| 27 | • Cleaner | • ESPN Fantasy |
| 28 | • Coffee Bean | • Etsy |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|---------------------------|---------------------|
| 1 | • Evite | • Groupon |
| 2 | • Facebook | • Grubhub |
| 3 | • Facebook Lite | • HBOMax |
| 4 | • Facebook Messenger | • Headspace |
| 5 | • Fair | • Home Depot |
| 6 | • Faire | • Hulu |
| 7 | • FastSave | • Identity Force |
| 8 | • File Viewer for Android | • IHG |
| 9 | • Firehouse Subs | • Imprivata ID |
| 10 | • Fly Delta | • Indeed Job Search |
| 11 | • Frontpoint | • Instacart |
| 12 | • FuboTV | • Instagram |
| 13 | • Fulldive VR | • Instagram Repost |
| 14 | • Fundrise | • Jackpot Party |
| 15 | • Gallery | • Jaybird |
| 16 | • Game Launcher | • Jetpack |
| 17 | • Gametime | • Jimmy John’s |
| 18 | • Gangstar 4 | • Key Ring |
| 19 | • GIPHY | • Kinecta FCU |
| 20 | • Glassdoor | • Lasting |
| 21 | • Gold Fish | • Later |
| 22 | • GoMLS miami | • LinkedIn |
| 23 | • Good on You | • Little Caesars |
| 24 | • GoodRx | • Lyft |
| 25 | • GoodRx Pro | • Macy’s |
| 26 | • Goodtime | • MapMyRide |
| 27 | • Google | • Marcus |
| 28 | • GoToWebinar | • McDonald’s |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|-------------------------------------|--------------------|
| 1 | • Messenger | • Peet’s |
| 2 | • Microsoft Authenticator | • PetDesk |
| 3 | • Military Star Mobile | • PicCollage |
| 4 | • MixerBox | • Pinterest |
| 5 | • MX Player | • Pizza Hut |
| 6 | • myCigna | • Pocket |
| 7 | • myCricket | • Pocket Casts |
| 8 | • MyFitnessPal | • Pokerrr2 |
| 9 | • MySchoolBucks | • Pollo Tropical |
| 10 | • Nest | • Pomodoro |
| 11 | • Netflix | • Postmates |
| 12 | • News Break | • Premier League |
| 13 | • Nextdoor | • Publix |
| 14 | • NFL | • Publix Instacart |
| 15 | • Ninja’s Creed | • Puppr |
| 16 | • Ninja's Creed | • RaceTrac |
| 17 | • Nintendo Switch Parental Controls | • RAR |
| 18 | • NMB | • Realtor.com |
| 19 | • Noom | • Redbox |
| 20 | • NPR One | • Reddit |
| 21 | • NPR News | • Relay for Reddit |
| 22 | • OfferUp | • Revolve |
| 23 | • OpenTable | • Ring |
| 24 | • Outlook | • Robinhood |
| 25 | • ParkMobile | • Roblox |
| 26 | • PayByPhone | • Rover |
| 27 | • PayPal | • Samsung Internet |
| 28 | • PDK Touch | • Samsung Member |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|----------------------------------|-----------------------|
| 1 | • Samsung Notes | • Steam |
| 2 | • Samsung Print Service Plugin | • Strava |
| 3 | • Scam Shield | • StubHub |
| 4 | • Scanner App: PDF Document Scan | • SunPass |
| 5 | • Scrabble | • Surfline |
| 6 | • SeatGeek | • Sweatcoin |
| 7 | • Sezzle | • Talon |
| 8 | • SharkTracker – OCEARCH | • Target |
| 9 | • Shazam | • Target |
| 10 | • Shutterfly Share Site | • Tender Greens |
| 11 | • Skillshare | • Tesla |
| 12 | • Slack | • The Economist |
| 13 | • Sleep Cycle | • The New York Times |
| 14 | • Sleep Sounds | • The Athletic |
| 15 | • Slingshot Stunt Driver | • The Grand Mafia |
| 16 | • SmartNews | • The RealReal |
| 17 | • SmartWorld | • TheSCOOP |
| 18 | • Smule | • TheScore |
| 19 | • Solitaire | • The Weather Channel |
| 20 | • Sonos S1 | • Think Dirty |
| 21 | • SOPlayer | • Ticketmaster |
| 22 | • SoundCloud | • TikTok |
| 23 | • Spotify | • Tiles Hop |
| 24 | • Square Pic | • Tiny Scanner |
| 25 | • Sricam | • T-Mobile |
| 26 | • Stack Colors | • T-Mobile Tuesdays |
| 27 | • Starbucks | • Travelzoo |
| 28 | • Stash | • Trip.com |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|-----------------|------------------------|
| 1 | • Trivago | • WhatsApp |
| 2 | • Truebill | • WHOOP |
| 3 | • Tuner-Pitched | • WikiEM |
| 4 | • Turbo | • Wish |
| 5 | • Twitter | • WordPress |
| 6 | • Uber | • Wordscapes |
| 7 | • Uber Eats | • Xfinity |
| 8 | • Udemmy | • Xfinity Mobile |
| 9 | • UpToDate | • Xfinity My Account |
| 10 | • USAA | • Yahoo Mail |
| 11 | • USPS Mobile | • Yelp |
| 12 | • Venmo | • Yoga Down Dog |
| 13 | • Viber | • Your Phone Companion |
| 14 | • Vivino | • Zappos |
| 15 | • Walgreens | • Zelle |
| 16 | • WalletHub | • Zillow |
| 17 | • Walmart | • ZipRecruiter |
| 18 | • Wattpad | • Zoho Mail |
| 19 | • Waze | • Zoom |

20 Subject to the foregoing caveats, Google has been able to determine that the following
 21 Android apps have not had Google Analytics for Firebase enabled:

- | | | |
|----|-------------------------------|-------------------|
| 22 | • A to Z ECG Interpretation | • Audible |
| 23 | • Amazon Music | • Barcode Scanner |
| 24 | • Amazon Shopping | • Bleacher Report |
| 25 | • Among Us | • Boxer |
| 26 | • App Installer | • Burger King |
| 27 | • Apple TV | • Cash App |
| 28 | • Atmosphere Binaural Therapy | • Chill |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|-------------------------|------------------------|
| 1 | • Chrome | • NCCN Guidelines |
| 2 | • Clinicals | • Nike Run Club |
| 3 | • Clock | • Oak |
| 4 | • Digital Wellbeing | • Pandora |
| 5 | • Disney Plus | • PetPage |
| 6 | • Docs | • Pi Music Player |
| 7 | • Drive | • Ping |
| 8 | • DroidCam | • Preview |
| 9 | • Ecosia | • ProtonMail |
| 10 | • EECU | • QR Reader |
| 11 | • ES File Explorer | • QuickMemo+ |
| 12 | • Essential Oils & More | • Retro Bowl |
| 13 | • Fire TV | • Samsung Gallery |
| 14 | • Galaxy Themes | • Samsung Pay |
| 15 | • Hangouts | • Samsung voice input |
| 16 | • Harrison’s Manual | • Screen Filter |
| 17 | • Ibotta | • ShareWaste |
| 18 | • IMDB | • Shopify |
| 19 | • Instant Save | • Shopify POS |
| 20 | • Kindle | • Signal |
| 21 | • Lawnchair | • SIM Toolkit |
| 22 | • Layout | • Sketch Photo |
| 23 | • Letgo | • Smart Switch |
| 24 | • Menchie’s | • Smokeball |
| 25 | • Messenger Kids | • Snapchat |
| 26 | • Microsoft Word | • Snellen Chart |
| 27 | • Mobile Service | • Sprouts |
| 28 | • myAT&T | • Square Point of Sale |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- Stickman Parkour Platform
- Voice Recorder
- Textra
- Whole Foods
- Time Zone Updater
- Wikipedia
- Verizon Voicemail
- Yahoo Fantasy
- VeSyncFit
- Zen Planner

Google’s investigation is ongoing. Google can investigate iOS apps as well if Plaintiffs can identify which of the apps identified in the First Amended Complaint were used by Plaintiffs on iOS devices.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving the foregoing, Google responds as follows: Google has conducted a reasonably diligent search to determine which iOS apps of the ones identified in Plaintiffs’ First Amended Complaint (FAC ¶¶ 207, 215, 217) have had Google Analytics for Firebase enabled. As with Google’s investigation into the Android apps, there are several complications to keep in mind with such data. First, app developers may give their users granular control over whether Google Analytics for Firebase is enabled on that app, and that could be turned on and off at any given moment by a user. Second, an app developer may show as having Google Analytics for Firebase turned on, but not actually be using it to transmit any data. Third, even if an app developer has used Google Analytics for Firebase in the past, that does not mean that it is currently using it. Finally, Google’s investigation is current as of May 23, 2021.

Subject to the foregoing caveats, Google has been able to determine that the following iOS apps have had Google Analytics for Firebase enabled:

- Acorns
- Auntie Anne’s
- Alarm Clock for Me
- Avast Cleanup
- Alibaba
- B. Good
- AliExpress
- BaseballSuperstars2020
- AllTrails
- BBC America
- Angie’s List
- BestBuy
- Applebee’s
- Bible

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|----------------------|------------------------|
| 1 | • Bodies by Rachel | • Dosh |
| 2 | • Booking.com | • Dropbox |
| 3 | • Burger King | • Duo |
| 4 | • California Lottery | • Duolingo |
| 5 | • Call of Duty | • E*Trade |
| 6 | • Calm | • eBay |
| 7 | • Canva | • Ecobee |
| 8 | • Cardiogram | • Einstein Bros Bagels |
| 9 | • Cash App | • EMAY Portable ECG |
| 10 | • CBS Sports | Monitor |
| 11 | • Chewy | • Emergency Alerts |
| 12 | • Chili’s | • Epocrates |
| 13 | • Chill | • ESPN Fantasy |
| 14 | • Chrome | • Evite |
| 15 | • ClassDojo | • Facebook |
| 16 | • Clawee | • Facebook Messenger |
| 17 | • Coffee Bean | • Fair |
| 18 | • Cooking Fever | • Faire |
| 19 | • Coursera | • Firehouse Subs |
| 20 | • Dad Jokes | • Frontpoint |
| 21 | • Daily Mail Online | • FuboTV |
| 22 | • Dairy Queen | • Fulldive VR |
| 23 | • Dillon’s | • Fundrise |
| 24 | • Discord | • Gametime |
| 25 | • Dogo | • Gangstar 4 |
| 26 | • Dollar General | • GIPHY |
| 27 | • Domino’s | • Glassdoor |
| 28 | • DoorDash | • GoldFish |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|---------------------|----------------------------|
| 1 | • GoMLSmiami | • Messenger |
| 2 | • Good On You | • Military Star Mobile |
| 3 | • GoodRx Pro | • MixerBox |
| 4 | • Google | • MX Player |
| 5 | • GoToWebinar | • My Verizon |
| 6 | • Groupon | • myCigna |
| 7 | • Grubhub | • myCricket |
| 8 | • Harrison’s Manual | • MyFitnessPal |
| 9 | • Headspace | • MySchoolBucks |
| 10 | • Home Depot | • Nest |
| 11 | • IdentityForce | • News Break |
| 12 | • Indeed Job Search | • Nextdoor |
| 13 | • Instacart | • NFL |
| 14 | • Instagram | • Ninja’s Creed |
| 15 | • Jackpot Party | • Nintendo Switch Parental |
| 16 | • Jaybird | Controls |
| 17 | • Jetpack | • NMB |
| 18 | • JimmyJohn’s | • Noom |
| 19 | • Key Ring | • NPR News |
| 20 | • Kinecta FCU | • NPR One |
| 21 | • Lasting | • Oak |
| 22 | • Later | • OCEARCH – Shark Tracker |
| 23 | • Letgo | • OfferUp |
| 24 | • Little Caesars | • OpenTable |
| 25 | • Map My Ride | • ParkMobile |
| 26 | • Marcus | • PayByPhone |
| 27 | • McDonald’s | • PayPal |
| 28 | • Menchie’s | • pdk touch |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|-----------------------------|--------------------------|
| 1 | • Peet’s | • Sezzle |
| 2 | • PetDesk | • Shazam |
| 3 | • PicCollage | • Shutterfly Share Sites |
| 4 | • Ping | • Skillshare |
| 5 | • Pinterest | • Slack |
| 6 | • Pizza Hut | • Sleep Cycle |
| 7 | • Pocket | • Slingshot Stunt Driver |
| 8 | • Pocket Casts | • Smart World |
| 9 | • Pokerrr2 | • SmartNews |
| 10 | • Pomodoro | • Smule |
| 11 | • Postmates | • Solitaire |
| 12 | • Premier League | • Sonos S1 |
| 13 | • Publix | • SoundCloud |
| 14 | • Puppr | • Spotify |
| 15 | • QR Reader | • Stack Colors |
| 16 | • RaceTrac | • Stash |
| 17 | • Realtor.com | • Strava |
| 18 | • Redbox | • StubHub |
| 19 | • Reddit | • SunPass |
| 20 | • Repost for Instagram | • Surflin |
| 21 | • Revolve | • Sweatcoin |
| 22 | • Robinhood | • Target |
| 23 | • Rover | • Tender Greens |
| 24 | • Scam Shield | • The Athletic |
| 25 | • Scanner App: PDF Document | • The Economist |
| 26 | • Scan | • The Grand Mafia |
| 27 | • Scrabble | • The New York Times |
| 28 | • SeatGeek | • The RealReal |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | |
|-----------------------|------------------|
| • The Weather Channel | • USPS Mobile |
| • theScore | • Venmo |
| • Think Dirty | • Viber |
| • Ticketmaster | • Vivino |
| • TikTok | • Walgreens |
| • Tiles Hop | • WalletHub |
| • TinyScanner | • Walmart |
| • T-Mobile | • Wattpad |
| • T-Mobile Tuesdays | • Waze |
| • Travelzoo | • WHOOP |
| • Trip.com | • WikiEM |
| • Trivago | • Wish |
| • Truebill | • Wordscapes |
| • Tuner-Pitched | • Xfinity |
| • Turbo | • Xfinity Mobile |
| • Twitter | • Yoga Down Dog |
| • UberEats | • Zappos |
| • Udemyl | • Zelle |
| • UpToDate | • Zillow |
| • USAA | • ZipRecruiter |

Subject to the foregoing caveats, Google has been able to determine that the following iOS apps have not had Google Analytics for Firebase enabled:

- | | |
|----------------------|---------------------|
| • ABC | • American Airlines |
| • Accuweather | • Among Us |
| • Acrobat Reader | • Apple Music |
| • Amazon Music | • Apple Podcasts |
| • Amazon Prime Video | • Apple TV |
| • Amazon Shopping | • Atmosphere |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | | |
|----|-------------------------------|---------------------------|
| 1 | • Atmosphere Binaural Therapy | • Goodtime |
| 2 | • Audible | • Hangouts |
| 3 | • Audio Recorder | • HBO Max |
| 4 | • Baskin-Robbins | • Hulu |
| 5 | • BetterHelp | • Ibotta |
| 6 | • Bleacher Report | • IHG |
| 7 | • BluHop | • IMDB |
| 8 | • Boxer | • Imprivata ID |
| 9 | • Bruster’s | • Instant Save |
| 10 | • Candy Crush | • Kindle |
| 11 | • Candy Crush Saga | • Layout |
| 12 | • CBS | • LinkedIn |
| 13 | • Chick-fil-A | • Lyft |
| 14 | • Craigslist | • Macy’s |
| 15 | • Disney+ | • Messenger Kids |
| 16 | • Docs | • Microsoft Authenticator |
| 17 | • Drive | • Microsoft Word |
| 18 | • DroidCam | • Mobile Service |
| 19 | • Ecosia | • myAT&T |
| 20 | • EECU | • NCCN Guidelines |
| 21 | • ES File Explorer | • Netflix |
| 22 | • ESPN | • Nike Run Club |
| 23 | • Etsy | • Outlook |
| 24 | • Fastsave | • Pandora |
| 25 | • Fire TV | • PetPage |
| 26 | • Fitness | • Pollo Tropical |
| 27 | • Fly Delta | • Preview |
| 28 | • GoodRx | • ProtonMail |

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

- | | |
|-----------------------------|----------------------|
| • Quick Memo+ | • Stocks |
| • RAR | • Stream |
| • Retro Bowl | • Tesla |
| • Ring | • Uber |
| • Roblox | • USPSTF |
| • ShareWaste | • VeSyncFit |
| • Shopify | • Voice Recorder |
| • Shopify POS | • WebView |
| • Signal | • WhatsApp |
| • Sleep Sounds | • Whole Foods |
| • SmartSwitch | • Wikipedia |
| • Smokeball | • WordPress |
| • Snapchat | • Xfinity My Account |
| • SoPlayer | • Yahoo Fantasy |
| • Sprouts | • Yahoo Mail |
| • Square Point of Sale | • Yelp |
| • Sricam | • Zen Planner |
| • Starbucks | • Zoho Mail |
| • Steam | • Zoom |
| • Stickman Parkour Platform | |

INTERROGATORY NO. 3:

Please describe the history of the development of Web & App Activity, including without limitation (a) when and why Google first launched the Web & App Activity functionality, (b) when and why Google made any changes to Web & App Activity subsequent to launch, and (c) the persons involved with the development of and all subsequent changes to Web & App Activity.

RESPONSE TO INTERROGATORY NO. 3:

Google objects to Interrogatory No. 3 as vague and ambiguous as to the undefined term

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 Analytics for Firebase to a user’s Google account. Because WAA has never controlled Google
2 Analytics for Firebase, WAA and its particular development and change history is not relevant.
3
4

5 Dated: November 5, 2021

WILLKIE FARR & GALLAGHER LLP

6 By: /s/ Benedict Y. Hur

7 Benedict Y. Hur

8 *Attorneys for Defendant Google LLC*
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28